

1 GIBSON, DUNN & CRUTCHER LLP  
2 JOEL S. SANDERS, SBN 107234,  
JSanders@gibsondunn.com  
3 RACHEL S. BRASS, SBN 219301,  
RBrass@gibsondunn.com  
4 REBECCA JUSTICE LAZARUS, SBN 227330,  
RJustice@gibsondunn.com  
5 SERENA G. LIU, SBN 264977,  
SGLiu@gibsondunn.com  
6 555 Mission Street  
Suite 3000  
7 San Francisco, California 94105-2933  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

8 Attorneys for Defendant  
9 CHUNGHWA PICTURE TUBES, LTD.

10 UNITED STATES DISTRICT COURT

11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12  
13 IN RE: TFT-LCD (FLAT PANEL) ANTITRUST  
LITIGATION

14 \_\_\_\_\_  
15 This Document Related to Individual Case No.  
C V:10-4945 SI

16 TARGET CORP.; SEARS, ROEBUCK AND  
CO.; KMAR CORP.; OLD COMP INC.;  
GOOD GUYS, INC.; RADIOSHACK CORP.;  
17 NEWEGG INC.,

18 Plaintiffs,

19 v.

20 AU OPTRONICS CORPORATION, AU  
OPTRONICS CORPORATION AMERICA,  
INC.; CHI MEI OPTOELECTRONICS  
CORPORATION; CHI MEI  
OPTOELECTRONICS USA, INC.; CMO  
JAPAN CO. LTD.; NEXGEN MEDIATECH,  
INC.; NEXGEN MEDIATECH USA, INC.;  
CHUNGHWA PICTURE TUBES LTD.;  
TATUNG COMPANY OF AMERICA, INC.;  
EPON IMAGING DEVICES CORPORATION;  
EPSON ELECTRONICS AMERICA, INC.;  
HANNSTAR DISPLAY CORPORATION; LG  
DISPLAY CO. LTD.; LG DISPLAY  
AMERICA, INC.; SAMSUNG  
SEMICONDUCTOR, INC.; SAMSUNG  
ELECTRONICS AMERICA, INC.; SHARP

14 CASE NO. 03:07-MD-01827 SI  
INDIVIDUAL CASE NO. C V:10-4945 SI

15 **STIPULATION AND [PROPOSED]  
ORDER WAIVING ORAL ARGUMENT  
ON PLAINTIFFS' MOTION FOR ORDER  
AUTHORIZING PLAINTIFFS TO SERVE  
CHUNGHWA PICTURE TUBES, LTD.  
THROUGH ITS U.S. COUNSEL**

1 CORPORATION; SHARP  
2 ELECTRONICS CORPORATION; TOSHIBA  
3 CORPORATION; TOSHIBA AMERICA  
4 ELECTRONICS COMPONENTS, INC.;  
TOSHIBA MOBILE DISPLAY  
TECHNOLOGY CO., LTD.; TOSHIBA  
AMERICA INFORMATION SYSTEMS, INC.,

5 Defendants.

6

7

8 The undersigned counsel, on behalf of Plaintiffs Target Corporation, Sears, Roebuck and Co.,  
9 Kmart Corporation, Old Comp Inc., Good Guys, Inc., RadioShack Corporation, and Newegg Inc.  
10 (collectively “Plaintiffs”) and Defendant Chunghwa Picture Tubes, Ltd. (“Chunghwa”), request that  
11 the Court take off calendar the hearing on Plaintiffs’ Motion for Order Authorizing Plaintiffs to Serve  
12 Defendant Chunghwa Picture Tubes, Ltd. Through Its U.S. Counsel (the “Motion”) and rule based on  
13 the papers.

14 WHEREAS Plaintiffs filed the Motion on February 15, 2011 and Chunghwa filed a  
15 Memorandum in Opposition on March 4, 2011;

16 WHEREAS Plaintiffs and Chunghwa agree that the issue has been fully briefed; and

17 WHEREAS the Court has previously heard argument and ruled on substantially similar  
18 motions in related cases;

19 THEREFORE, Plaintiffs and Chunghwa, by their respective counsel, stipulate and agree to  
20 waive oral argument on the Motion, and submit to the Court’s ruling on the papers that have been  
21 filed. The parties agree that the hearing scheduled for 9:00 a.m. on March 25, 2011 may be taken off

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 calendar, subject to any further direction of the Court.

2 IT IS SO STIPULATED.

3 Respectfully submitted,

4 DATED: March 4, 2011

5 By: /s/ Jason C. Murray  
6 Jason C. Murray, SBN 169806  
7 CROWELL & MORING LLP  
8 515 South Flower St., 40th Floor  
Los Angeles, California 90071  
Telephone: (213) 443-5582  
Facsimile: (213) 622-2690

9 *Counsel for Plaintiffs Target Corporation, Sears,  
Roebuck and Co., Kmart Corporation, Old Comp Inc.,  
Good Guys, Inc., RadioShack Corporation, and Newegg  
Inc.*

12 By: /s/ Rachel S. Brass  
13 Joel S. Sanders, SBN 107234  
14 Rachel S. Brass, SBN 219301  
GIBSON, DUNN & CRUTCHER LLP  
15 555 Mission Street  
Suite 3000  
San Francisco, California 94105-2933  
16 Telephone: (415) 393-8200  
Facsimile: (415) 393-8306

17 *Counsel for Defendant Chunghwa Picture Tubes, Ltd.*

19 **Attestation:** The filer of this document attests that the concurrence of the other signatory  
20 thereto has been obtained.  
21

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
23

24 3/8/11

25 Date Entered

26   
27  
28

Honorable Judge Susan Illston

## **DECLARTION OF SERVICE**

I, Carol Dickerson, declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite 3000, San Francisco, California, 94105, in said County and State. On March 4, 2011, I served the within:

**NOTICE OF SUBSTITUTION OF COUNSEL FOR DEFENDANT AND [PROPOSED] ORDER**

to all named counsel of record as follows:

**BY ECF (ELECTRONIC CASE FILING):** I e-filed the above-detailed documents utilizing the United States District Court, Northern District of California's mandated ECF (Electronic Case Filing) service on March 4, 2011. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the documents upon confirmation of e-filing.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document(s) were printed on recycled paper, and that this Declaration of Service was executed by me on March 4, 2011, at San Francisco, California.

/s/  
Carol Dickerson